

IN THE UNITED STATES DISTRICT COURT  
THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

L.E., by his next friends )  
and parents, SHELLEY )  
ESQUIVEL and MARIO ESQUIVEL )

Plaintiff )

vs. )

No. 3:21-cv-00835

BILL LEE, in his official )  
capacity as Governor of the )  
Tennessee, et al. )

Defendants )

VIDEOTAPED

DEPOSITION

OF

L.E.

August 1, 2022

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DONNA D. TOUSEULL, LCR  
HOOD & McMASTERS  
P. O. Box 894, Seymour, TN 37865-0894  
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VIDEOGRAPHER: Ernie Tracy, Tracy Imaging

1 Q Did you talk to anyone about wanting to  
2 play golf for the high-school boys' team?

3 A Yes.

4 Q Okay. Who did you speak with?

5 A My mom, dad, friends, lawyer, lawyers.

6 Q Sure.

7 A Yeah.

8 Q Do you know who the boys' golf coach is  
9 for Farragut High School?

10 A No.

11 Q Do you know when the boys' golf team have  
12 tryouts at your school?

13 A No, though I think my mom does.

14 Q Do you follow the players on the Farragut  
15 boys' golf team or keep track of how they're doing on the  
16 team?

17 A Not exactly keep track, though I do know  
18 they are good.

19 Q What do you know about them being good?

20 A They got second place in a tournament, I  
21 think it was a tournament.

22 Q Are you friends with anyone on the boys'  
23 golf team?

24 A No.

25 Q Why did you not go to tryouts for the

1 golf team before or for your freshman year of high school?

2 A Because even if I did have the chance to  
3 try out, if I can't even be able to play on the guy's golf  
4 team, there -- I just wouldn't try out. There's no point.

5 Q Do you know if the boys and girls try out  
6 at the same time for the golf team?

7 A I do not know.

8 Q Do you know what tryout what -- do you  
9 know what someone has to do at the tryouts to see whether  
10 they can make the team?

11 A I do not. I would expect you just to be  
12 able to play well.

13 Q Have you -- do you know what a handicap  
14 is for golf?

15 A Yes.

16 Q What is your understanding of a handicap?

17 A My understanding of it is where you get  
18 to be closer to the hole or something that helps you.

19 Q Do you know how golfers keep score?

20 A Depending on how many hits it takes you  
21 until you get to the hole. It could be birdie, par,  
22 bogey, double bogey max, and if you're really, really  
23 lucky, eagle, and I never got that. I wish I got an  
24 eagle.

25 Q Do you know what par is?

1 even saying the whole list here. Just little things just  
2 to work on. I think the biggest one right now I'm working  
3 on is speed.

4 Q Okay. And what type of speed?

5 A What do you mean by type?

6 Q Well, so are we talking about your swing  
7 speed?

8 A Yes.

9 Q Okay, perfect. All right. So I played  
10 golf in high school and college, so it's always exciting  
11 to meet somebody that loves golf also.

12 When I -- sometimes my coaches would ask  
13 me if I was working on putting, for example, to count how  
14 many putts I took in a certain period of -- in a certain  
15 number of holes and then report back to them about that.  
16 Has your golf coach ever asked you to do something like  
17 that?

18 A No, he just -- I usually take -- okay.  
19 At the end of it, we usually take notes on things I should  
20 do better. Then I'll take a picture, and then I'll just  
21 go home and then go somewhere else, look at the notes  
22 again and work on some of that.

23 Q Okay.

24 A Yeah.

25 Q Do you know who Coach Higgins is at

1 Farragut High School?

2 A I've heard of that coach, but I don't  
3 actually know them.

4 Q So you've never spoken to Coach Higgins.

5 A Yes.

6 Q Have you ever spoken to Dr. Bartlett  
7 about wanting to play golf?

8 A Not directly.

9 Q Okay. Have you spoken to Coach Dodgen  
10 about wanting to play golf?

11 A I don't think so either. I honestly am  
12 kind of getting confused with the names. I don't actually  
13 remember certain names, so I'm just going to say no.

14 Q Okay. I'll try to make this easy. Have  
15 you ever spoken to anyone on staff at Farragut High School  
16 about wanting to play golf?

17 A No.

18 Q Okay.

19 A I think.

20 Q Have you ever spoken to anyone who works  
21 for Knox County Schools about wanting to play golf?

22 A I'm going to say no.

23 Q Okay. And then we talked briefly earlier  
24 about a handicap in golf, and you talked briefly about  
25 what your understanding about that is. Have you ever